REVISED 5-19-05

KAHL ENVIRONMENTAL SERVICES
COMMUNITY HEALTH AND SAFETY PLAN

Well Installation Project
Schuff Steel Site
3202 Hoover Ave
National City, California 91950

INTRODUCTION

This Community Health and Safety Plan addresses general safety practices which shall be applied during the installation of one groundwater monitoring well at the subject site to protect the general public's health and safety during project activities.

1.0 Site Identification/Description

1.1 Name	Schuff Steel, Inc.
1.2 Address	3202 Hoover Ave National City, California
1.3 Property Contact	Matthew Parker Schuff Steel, Inc. (619) 477-9311
1.4 HMMD Estab. No.	H08382-001

The site is located within a portion of National City characterized by mixed commercial and industrial development. The site lies immediately adjacent to and east of Interstate Highway 5, the San Diego Trolley line and the San Diego & Arizona Eastern Railroad line. The site vicinity is characterized by commercial and light industrial buildings and warehouses to the north and east, and two freeways, Interstate 5 and State Highway 54, to the west and south, respectively. Much of the commercial district to the east and northeast is made up of automobile dealerships bordering National City Boulevard. Commercial and industrial businesses to the north include National City Self Storage, Golden Coast Oil Company, Hearne Machining Co., and PPG Auto Glass, Inc. Farther to the east across Hoover Avenue, commercial and industrial businesses include Baker Hardwood Lumber Company and Republic Supply, Inc. The site is adjoined to the south by the Hyperbaric Technologies, Inc. site, a commercial manufacturing facility. The nearest residential development is a mobile home park located approximately one-quarter mile east of the site. The Sweetwater River is located about 850 feet south of the site and San Diego Bay (nearest channel) is approximately 4,000 feet southwest of the site.

The site and vicinity is generally flat-lying with a gentle grade to the west. The USGS National City 7.5 minute Quadrangle map (1967, photo-revised 1975) indicates the western portion of the site is at an elevation of 10 feet above mean sea level. The Schuff Steel facility is comprised of two parcels totaling seven acres. The parcel to the north is approximately 4.92 acres and contains no significant improvements although it is utilized as a storage yard. The site discussed in this workplan is the southern parcel consisting of approximately 2.06 acres.

The south parcel site is approximately 450 feet in its longest dimension along the northern boundary narrowing southward to 360 feet along the southern property boundary by 220 feet wide north to south. Schuff Steel, Inc. has developed most of the parcel for steel fabrication operations. Except for some minor areas of exposed soil and landscaping, most of the property is paved with asphalt, concrete, or covered with structures. The majority of the site is surrounded by chain-link fencing and locking gates. The northern portion of the site is occupied by a steel fabrication yard, which is covered by a large overhead crane run. The southern portion of the site is mostly paved parking or storage areas with a large, steel framed storage building ("bolt barn"). To the west, a sloped embankment of the San Diego Trolley tracks borders the site.

The subject site has historically been used for steel fabrication. Historical forklift operations in support of steel fabrication required fuel storage. Two underground storage tanks (USTs), 3,000 and 5,000 gallons, were removed in 1987. Future site use is anticipated to remain the same.

2.0 Project Management

Project Name:	Schuff Steel Site
KES Project Manager:	Simon Loli, M.S.
KES Project Geologist	Scott Fenby, P.G.
KES Site Safety Officer:	Simon Loli, M.S.
KES Support Office:	7125 El Cajon Blvd Suite 5 San Diego, California 92115 (619) 797-1200

3.0 Project Description

KES will be supervising site activities associated with the installation of one groundwater monitoring well. The site activities will include drilling and waste management in accordance with County of San Diego, Site Assessment And Mitigation Division (SAM) protocol.

4.0 Hazard Evaluation

4.1 Suspected Chemical Hazard

Based on reported prior usage of USTs, the following substances are suspected to be encountered during the work:

Substance	Highest Observed Concentration	Primary Hazard
Total Petroleum Hydrocarbons – Gasoline and Diesel	5,800 mg/kg (prior to excavation & remediation)	Ingestion, Skin-Eye Contact/Absorption, Inhalation
Benzene	8.6 mg/kg (prior to excavation & remediation)	Ingestion, Skin-Eye Contact/Absorption, Inhalation

During the site assessment activities, KES will notify the local Fire Department and SAM immediately whenever a fire hazard or explosion hazard is present. This would include circumstances in which 20% of the Lower Explosive Limit (LEL) is detected in the boring or work area.

4.2 Off-site Risk Evaluation

The site vicinity is characterized by mixed heavy industrial and commercial properties. The dominant business activities in the area appear to be heavy manufacturing. The work area is located adjacent to a public thoroughfare (Hoover Avenue). Considering the proximity of the work area of public access and the nature of the suspected contaminants, (petroleum hydrocarbons), it is anticipated that the risk of off-site migration of fugitive hydrocarbon vapors is minimal but likely measurable. Therefore, air monitoring shall be performed during site activities using the equipment and action levels described below. The excavation site will be cordoned off to restrict public access. Within the secured zone, airborne hydrocarbon concentrations shall be monitored at ten and twenty-foot concentric monitoring zones around the area (if applicable).

Soil generated from drilling activities will be contained in 55-gallon DOT-rated drums. The drums will be hauled off by a licensed hauler under proper waste manifest documentation. Public notification shall consist of posting warnings at the project site and making the H&S plan available on site.

Zoned air monitoring will be performed in the breathing zone around the work areas using a PID. Due to the potential proximity of the public, action limits have been greatly reduced from the normal action limits. Organic vapor concentrations exceeding 25 ppm within 10 feet of the work areas will require the donning of half-face respirators with organic vapor cartridges by on-site

personnel and the exclusion of all non-essential personnel. Organic vapor concentrations exceeding 100 ppm 10 feet or 25 ppm 20 feet from the work areas will require the cessation of work. In the event that work must be stopped due to elevated vapor concentrations, the source of vapors will be mitigated using engineering controls, such as water, as feasible. Unauthorized personnel including site employees will be restricted from the project area during operations and protected from potentially hazardous materials or conditions following exploratory activities.

ACTION LEVELS

Monitoring Device	**Action Level**	**Action**
FID or PID	≥25 ppm* in Breathing Zone	Don Respirator
FID or PID	100 ppm* in Breathing Zone or 25 ppm @ 20'	Cease Work

* 15 Minute Average

4.3 Site Engineering Controls/Physical Hazard Evaluation

Site access will be limited to authorized project personnel only. The drilling locations will be barricaded off to limit public access. These barricaded areas will be considered the working perimeter of the site.

5.0 Equipment

5.1 Monitoring Equipment

A Photo or Flame Ionization Detector (P/FID) type of organic vapor analyzer shall be used throughout field activities to monitor for organic vapors within the breathing zone of project workers and to monitor a concentric safety zone around the site for public health outside of the general project area. The meter will be calibrated to an appropriate calibration gas.

5.2 Personal Protective Equipment

Based on our evaluation of potential hazards associated with the proposed activities, KES expects that the majority of the field activities can be completed in Level D protection. Air monitoring will be performed to determine actual PPE levels to be used.

The specific personal protective equipment required for the anticipated levels during the project include:

Level C
Chemical resistant clothing
Inner-outer chemical resistant gloves
Chemical resistant safety boots
Full or half facepiece, air canister or cartridge respirator
Safety Glasses
Hard Hat

Level D
Chemical resistant clothing/Field Coveralls
Work gloves or inner-outer chemical resistant gloves
Steel-toed boots or chemical resistant boots
Safety glasses
Hard hat

If air-purifying respirators are required, a half-face, organic vapor cartridge respirator will be issued. All personnel engaged in potentially hazardous field operations will have demonstrated the minimum 40-hours of training for health and safety at hazardous waste sites. All personnel donning respirators will have been properly fit-tested. No changes to the specified levels of protection will be made without prior approval of the Health and Safety Manager.

6.0 Decontamination Procedures

All personnel performing activities subject to potential contact with hazardous materials/waste will be required to thoroughly decontaminate their personal protective equipment, field equipment and person. Decontamination will include washing in a detergent solution and a tap water rinse. Decontamination procedures will be implemented upon exiting the work areas.

7.0 Emergency Planning

Fire/Explosion:
Notify the site manager. Request the manager to alert the fire department or designate a person to alert the fire department. Move all personnel to a safe location away from the affected area.

Personnel Injury:
Notify the Project Geologist and KES Health and Safety Officer. Evaluate the nature of injury. Decontaminate affected person to the extent possible. Initiate the appropriate first aid. Call for ambulance if necessary. Notify designated medical facility if appropriate.

Confined Spaces:
Excavations and trenches over 5 feet deep shall not be entered by personnel unless properly shored. Prior to entering confined spaces, the oxygen and explosive level must be tested using appropriate equipment operated by experienced personnel. Additionally, prior to entering confined spaces, a Safe Work Permit must be prepared.

EMERGENCY INFORMATION

(Post on Site)

CHEMICAL HAZARD: GASOLINE (Gasoline contains BENZENE, a known carcinogen)

Acute Symptoms*	**First Aid**
Dizziness, Nausea and Unconsciousness	Rest, Shade, Fresh Air. Get medical help

Hospital Name:

Scripps Memorial Hospital, Chula Vista
435 H Street
Chula Vista, California
(619) 691-7000 (general)
911 (emergency)

Transportation will be by contractor vehicle or ambulance, depending on the emergency. Direct contact of ambulance to be accomplished with company telephone on site, or by calling 911.

Directions to Hospital: From the site take Hoover Avenue south to 33rd Street, east to National City Blvd. Turn right (south), Proceed approximately 1.5 miles to H Street. Turn left (east), the hospital is on the left side at 435 H Street,Scripps Memorial Hospital. Thomas Guide Page 1310, Section B7.

Local Resources:

Ambulance: 911
Hospital Emergency Room: 911
Law Enforcement: 911
Fire Department: 911
Explosives Unit: 911
Poison Control Center: 911
Agency Contact: 338-2222
Client Contact: ..... (619) 477-9311

Company Resources:

Project Manager:	Simon Loli
Project Geologist:	Scott Fenby, RG
Health and Safety Officer:	Simon Loli

- **In the event of an accident, injury, or illness, an incident report must be completed and submitted within 24 hours.**

REVISED 5-19-05

DIRECTION TO HOSPITAL

Start: 3202 Hoover Ave, National City, CA 91950

End: 435 H St, Chula Vista, CA 91910

Total Distance: 2.3 Miles

Estimated Total Time: 6 minutes

Directions	Miles	Map
Start: Depart 3202 Hoover Ave, National City, CA 91950 on Hoover Ave (South)	0.1	
1: Turn LEFT (East) onto W 33rd St	0.2	
2: Turn RIGHT (South) onto National City Blvd	0.4	
3: Road name changes to Broadway	1.2	
4: Turn LEFT (East) onto H St	0.4	
End: Arrive 435 H St, Chula Vista, CA 91910		

Time Line Notes

2003

April	USTCF payment summary indicated reimbursement pending receipt of report.
May	Soil mitigation report completed.
	Scott spoke with DEH. DEH considering closure, requested MW-10 sampling
June	Sampled MW-10 on Hyperbaric property per DEH
Sept	Submitted MW-10 gw sampling report to DEH
Oct	DEH sent letter to Bannister requesting closure documentation incl site conceptual model and risk evaluation
Dec	SF spoke with DEH re: closure needs

2004

Jan	Scott learned from DEH that they didn't have report and promised to followup.
	Simon contacted Matt re: report, well destruction and geotracker.
Feb	KES delivered re-printed copies of soil mitigation report to Schuff to be forwarded to USTCF & DEH.
Mar-Dec	No activity (Kahl awaiting response from DEH)

2005

Mar	Matt called re: NFA & USTCF status
	Simon contacted DEH for status. DEH mentioned that last corresp Oct. 2003.
	Matt called re: status letter for corporation/bankers.
	DEH called to indicate she doesn't have the soil mitigation report.
	Simon talked with Matt who indicated Schuff will copy report and resend.
21	DEH called to indicate she received report with pages missing.
22	KES sent required pages.
April	Simon spoke with USTCF re: status of submittal, learned new submittal needed.
	DEH sent letter requesting a workplan for re-installing MW-4 and submission of a Site Conceptual Model.
	DEH also recommends submitting reports to Geotracker program.
May	
3	KES sent RR#6 to Schuff

KAHL ENVIRONMENTAL

7125 El Cajon Blvd., Suite 5
San Diego, California 92115

Tel: 619-797-1200
Fax: 619-797-1212

Transmittal

To:	Mr. Daniel J. Barkosky	From:	Simon Loli
Co.	Wells Fargo Business Credit, Inc. 100 West Washington Street, 15th Floor Phoenix, AZ 85003	Contents:	Site Update Status Report
Re:	Schuff Steel 3202 Hoover Avenue National City, CA	Date:	3-22-05

Dear Mr. Barkosky,

Per the request of Schuff Steel, we are providing this site status report for the National City site. Based on Kahl Environmental Services' (KES) last Groundwater Monitoring Report for the 3rd and 4th Quarter 2002 dated April 14, 2003, KES recommended site closure and no further action. The San Diego County Department of Environmental Health (DEH) concurred with our recommendation but requested that the down-gradient monitoring well MW-10 be re-sampled prior to issuing closure. Monitoring well MW-10 was sampled on June 25, 2003. Laboratory analytical results indicated that the compound of concern, benzene, was not detected in MW-10 above the laboratory detection limit of 1 microgram per liter (µg/l). This confirms and strengthens the case that the benzene plume at the site is stable and is not migrating off-site. This assessment was discussed in KES' "Supplemental Groundwater Data Report" dated September 24, 2003.

The County reviewed the report and issued a letter dated October 14, 2003 stating…."The Bannister Steel site has already completed the remedial action that was proposed in the Corrective Action Plan (CAP). Over excavation of contaminated soils were conducted to the extent practical between July and November 2001. Four quarters of groundwater monitoring have been conducted at the site except for monitoring well MW-10, to determine the effectiveness of the remedial actions. The

remedial actions at the site did not achieve the cleanup levels that were proposed in the CAP. However, the quarterly groundwater monitoring events have indicated that the benzene concentrations are decreasing and therefore the groundwater plume appears stable and may be decreasing. The SAM believes that even though the remedial action did not achieve the cleanup levels established in the CAP, additional corrective action will not be required at the Bannister site. The State Water Resources Control Board has requested that closure of sites be determined by evaluating the potential risks to human health and the environment by the contaminants of concern at the site. If the contamination remaining does not adversely affect human health, the environment or groundwater uses in the area, additional remediation will not be required at this time…."

Based on this information, the County requested additional information to be submitted in a closure report discussing items such as summary of previous environmental work, site conceptual modeling, risk receptors within a 2,500 foot radius of the site, estimation of time necessary for the contaminant concentrations at the site to achieve the proposed cleanup levels, and whether groundwater will be utilized during the estimated timeframe. The County is also in the process of reviewing KES' "Corrective Action Report – Mitigation of Total Petroleum Hydrocarbon Impact In Soil" report dated January 31, 2003 which contains information that would satisfy some of the above listed requests. Per a phone conversation with the County on March 22, 2005, the County also requested one more round of sampling for all groundwater monitoring wells to confirm that the plume is stable and is decreasing with time. KES is in the process of scheduling the sampling event and submitting the additional information requested by the County to proceed with the site closure process.

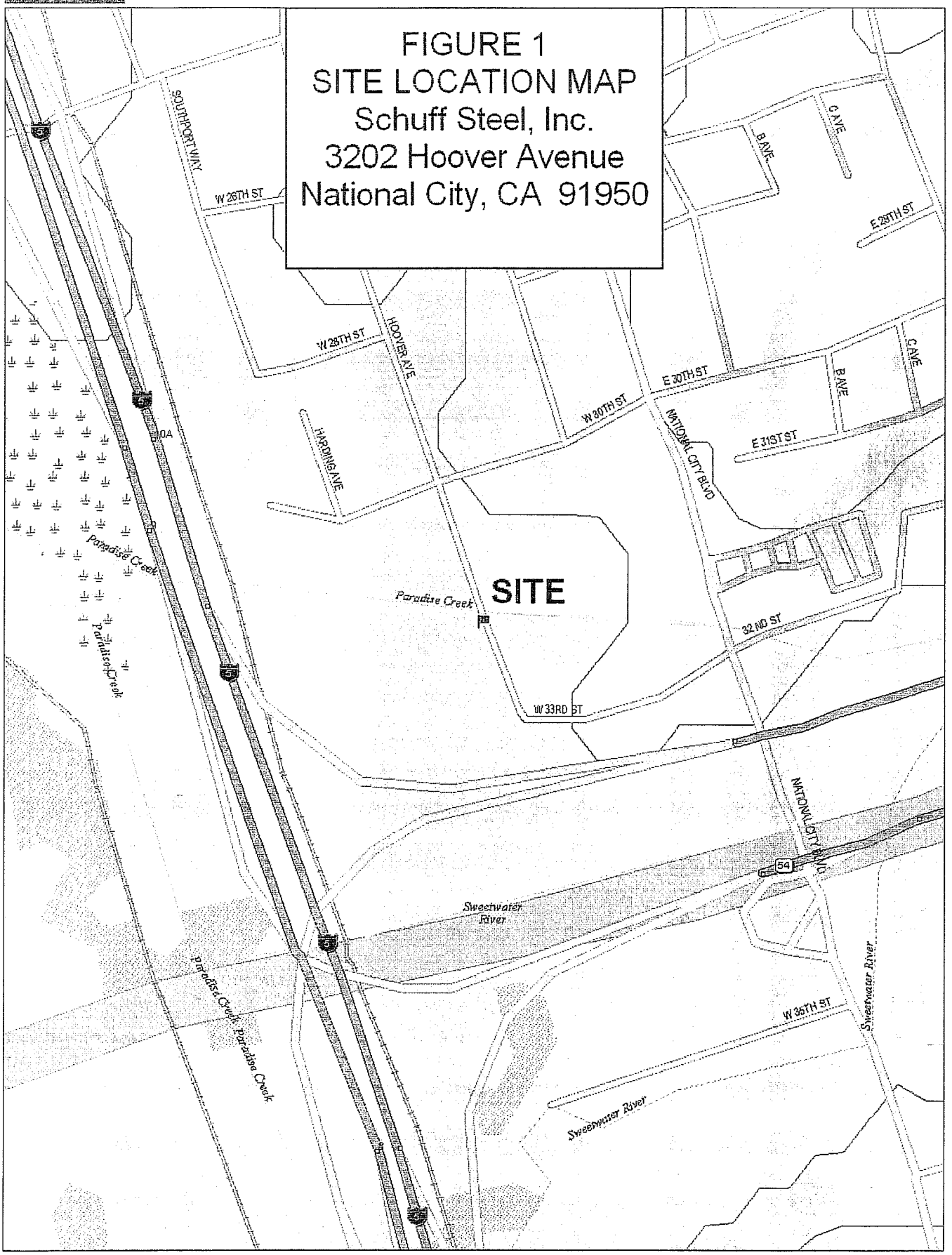
Please feel free to call me should you have any questions or require additional information.

Sincerely,

Simon N. Loli, M.S.
Project Manager

cc: Mr. Matthew Parker, Schuff Steel

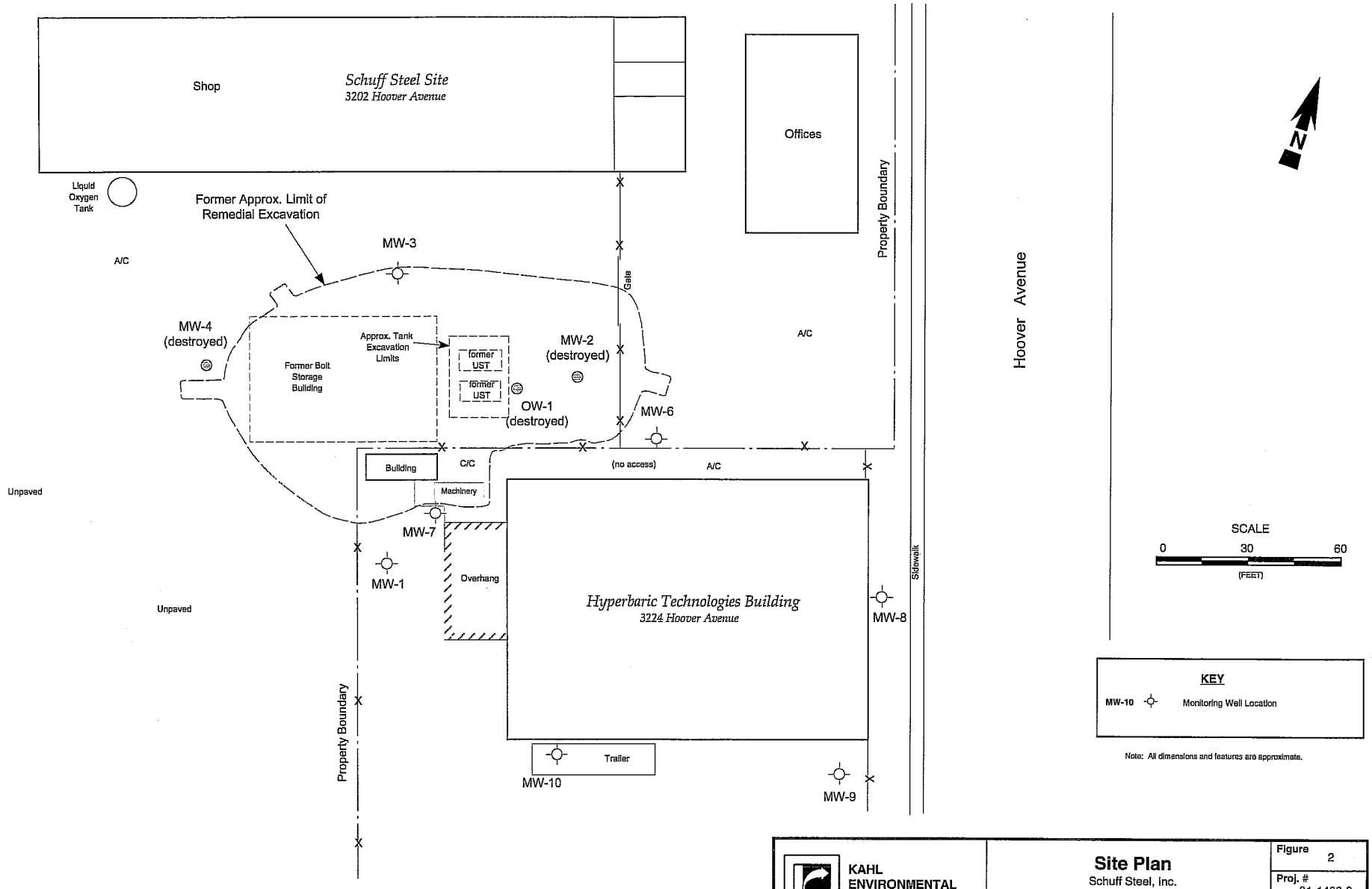
FIGURE 1
SITE LOCATION MAP
Schuff Steel, Inc.
3202 Hoover Avenue
National City, CA 91950



MN (0.0° W)

0 180 360 540 720 900 ft

Data Zoom 15-0



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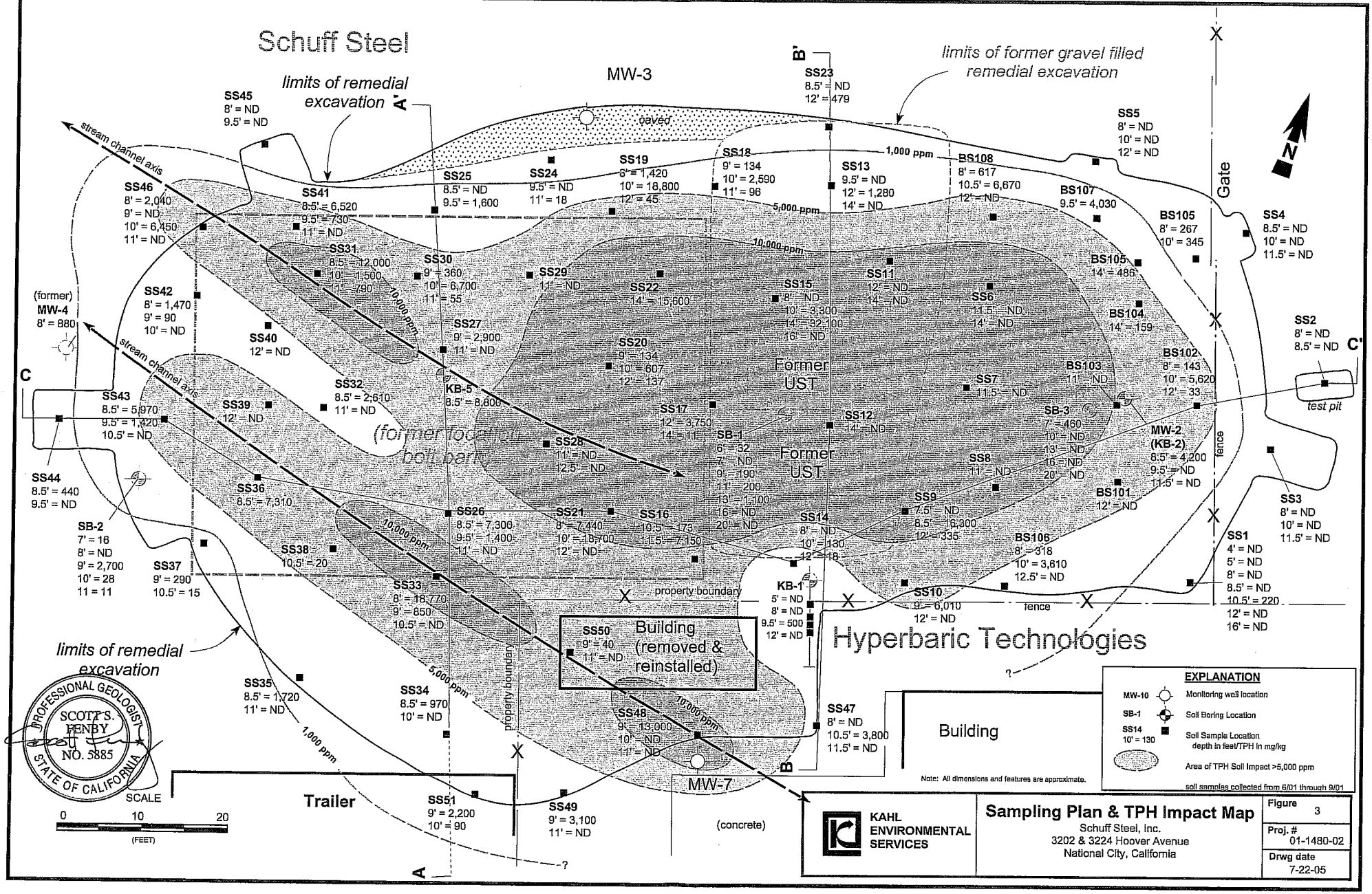
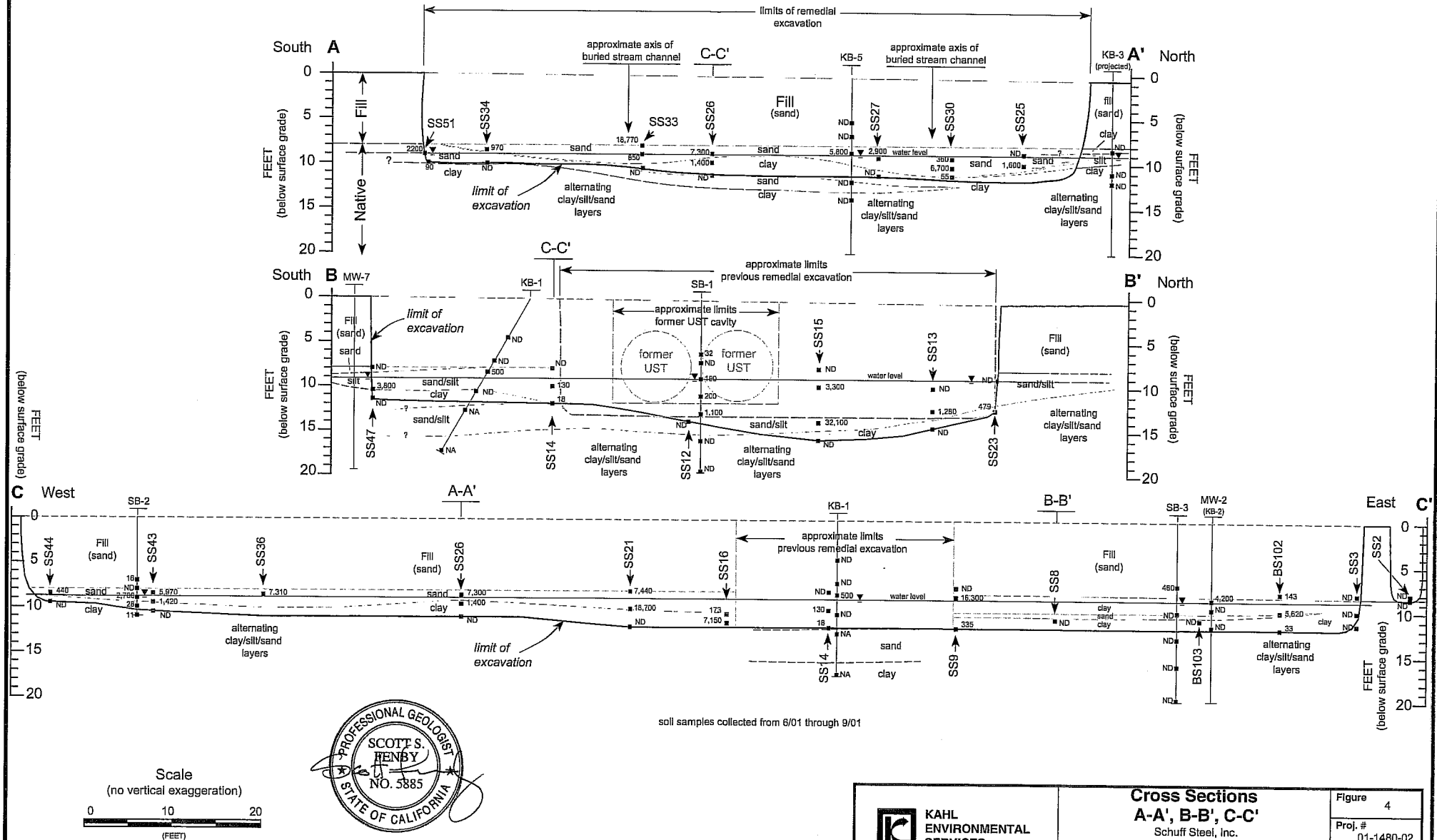
Site Plan
Schuff Steel, Inc.
3202 & 3224 Hoover Avenue
National City, California

Figure	2
Proj. #	01-1480-2
Drwg date	7-21-05


Schuff Steel
limits of remedial excavation
limits of former gravel filled remedial excavation
MW-3
A
A'
B
B'
C
C'
stream channel axis
stream channel axis
(former) MW-4 8' = 880
SS45 8' = ND 9.5' = ND
SS46 8' = 2,040 9' = ND 10' = 6,450 11' = ND
SS41 8.5' = 6,520 9.5' = 730 11' = ND
SS25 8.5' = ND 9.5' = 1,600
SS24 9.5' = ND 11' = 18
SS19 6' = 1,420 10' = 18,800 12' = 45
SS18 9' = 134 10' = 2,590 11' = 96
SS23 8.5' = ND 12' = 479
SS13 9.5' = ND 12' = 1,280 14' = ND
BS108 8' = 617 10.5' = 6,670 12' = ND
SS5 8' = ND 10' = ND 12' = ND
BS107 9.5' = 4,030
BS105 8' = 267 10' = 345
BS105 14' = 486
SS4 8.5' = ND 10' = ND 11.5' = ND
SS42 8' = 1,470 9' = 90 10' = ND
SS40 12' = ND
SS31 8.5' = 12,000 10' = 1,500 11' = 790
SS30 9' = 360 10' = 6,700 11' = 55
SS29 11' = ND
SS22 14' = 15,600
SS15 8' = ND 10' = 3,300 14' = 92,100 16' = ND
SS11 12' = ND 14' = ND
SS6 11.5' = ND 14' = ND
BS104 14' = 159
SS2 8' = ND 8.5' = ND
test pit
SS27 9' = 2,900 11' = ND
SS20 9' = 134 10' = 607 12' = 137
Former UST
BS103 11' = ND
BS102 8' = 143 10' = 5,620 12' = 33
SS7 11.5' = ND
SS32 8.5' = 2,610 11' = ND
KB-5 8.5' = 8,600
SS17 12' = 3,750 14' = 11
SB-1 6' = 32 7' = ND 9' = 190 11' = 200 13' = 1,100 16' = ND 20' = ND
SS12 14' = ND
SB-3 7' = 460 10' = ND 13' = ND 16' = ND 20' = ND
MW-2 (KB-2) 8.5' = 4,200 9.5' = ND 11.5' = ND
SS43 8.5' = 5,970 9.5' = 1,420 10.5' = ND
SS39 12' = ND
(former location of bolt barn)
SS28 11' = ND 12.5' = ND
SS8 11' = ND
SS44 8.5' = 440 9.5' = ND
SS36 8.5' = 7,310
SB-2 7' = 16 8' = ND 9' = 2,700 10' = 28 11 = 11
SS37 9' = 290 10.5' = 15
SS26 8.5' = 7,300 9.5' = 1,400 11' = ND
SS21 8' = 7,440 10' = 18,700 12' = ND
SS16 10.5' = 173 11.5' = 7,150
SS14 8' = ND 10' = 130 12' = 18
SS9 7.5' = ND 8.5' = 16,300 12' = 335
BS101 12' = ND
SS3 8' = ND 10' = ND 11.5' = ND
BS106 8' = 318 10' = 3,610 12.5' = ND
SS1 4' = ND 5' = ND 8' = ND 8.5' = ND 10.5' = 220 12' = ND 16' = ND
SS38 10.5' = 20
SS33 8' = 18,770 9' = 850 10.5' = ND
KB-1 5' = ND 8' = ND 9.5' = 500 12' = ND
SS10 9' = 6,010 12' = ND
property boundary
fence
Gate
fence
Building (removed & reinstalled)
SS50 9' = 40 11' = ND
Hyperbaric Technologies
limits of remedial excavation
SS35 8.5' = 1,720 11' = ND
SS34 8.5' = 970 10' = ND
property boundary
SS48 9' = 13,000 10' = ND 11' = ND
SS47 8' = ND 10.5' = 3,800 11.5' = ND
Building
MW-7
Trailer
SS51 9' = 2,200 10' = 90
SS49 9' = 3,100 11' = ND
(concrete)
5,000 ppm
10,000 ppm
1,000 ppm
N
PROFESSIONAL GEOLOGIST SCOTT S. FENBY NO. 5885 STATE OF CALIFORNIA
SCALE
0 10 20
(FEET)
EXPLANATION
MW-10 Monitoring well location
SB-1 Soil Boring Location
SS14 10' = 130 Soil Sample Location depth in feet/TPH in mg/kg
Area of TPH Soil Impact >5,000 ppm
soil samples collected from 6/01 through 9/01
Note: All dimensions and features are approximate.
KAHL ENVIRONMENTAL SERVICES
Sampling Plan & TPH Impact Map
Schuff Steel, Inc.
3202 & 3224 Hoover Avenue
National City, California
Figure 3
Proj. # 01-1480-02
Drwg date 7-22-05



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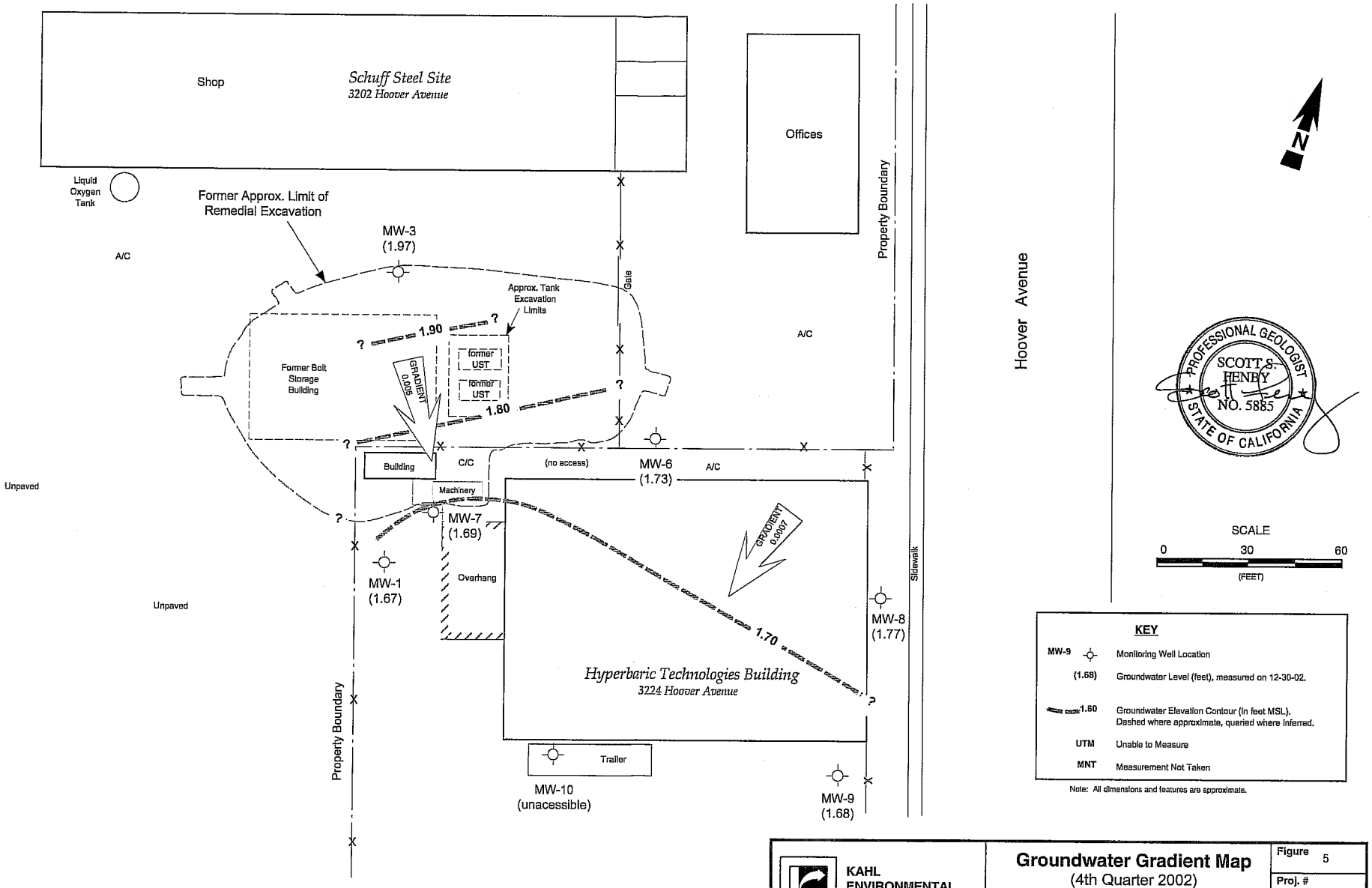
Cross Sections
A-A', B-B', C-C'
Schuff Steel, Inc.
3202 & 3224 Hoover Avenue
National City, California

Figure	4
Proj. #	01-1480-02
Drwg date	7-27-05



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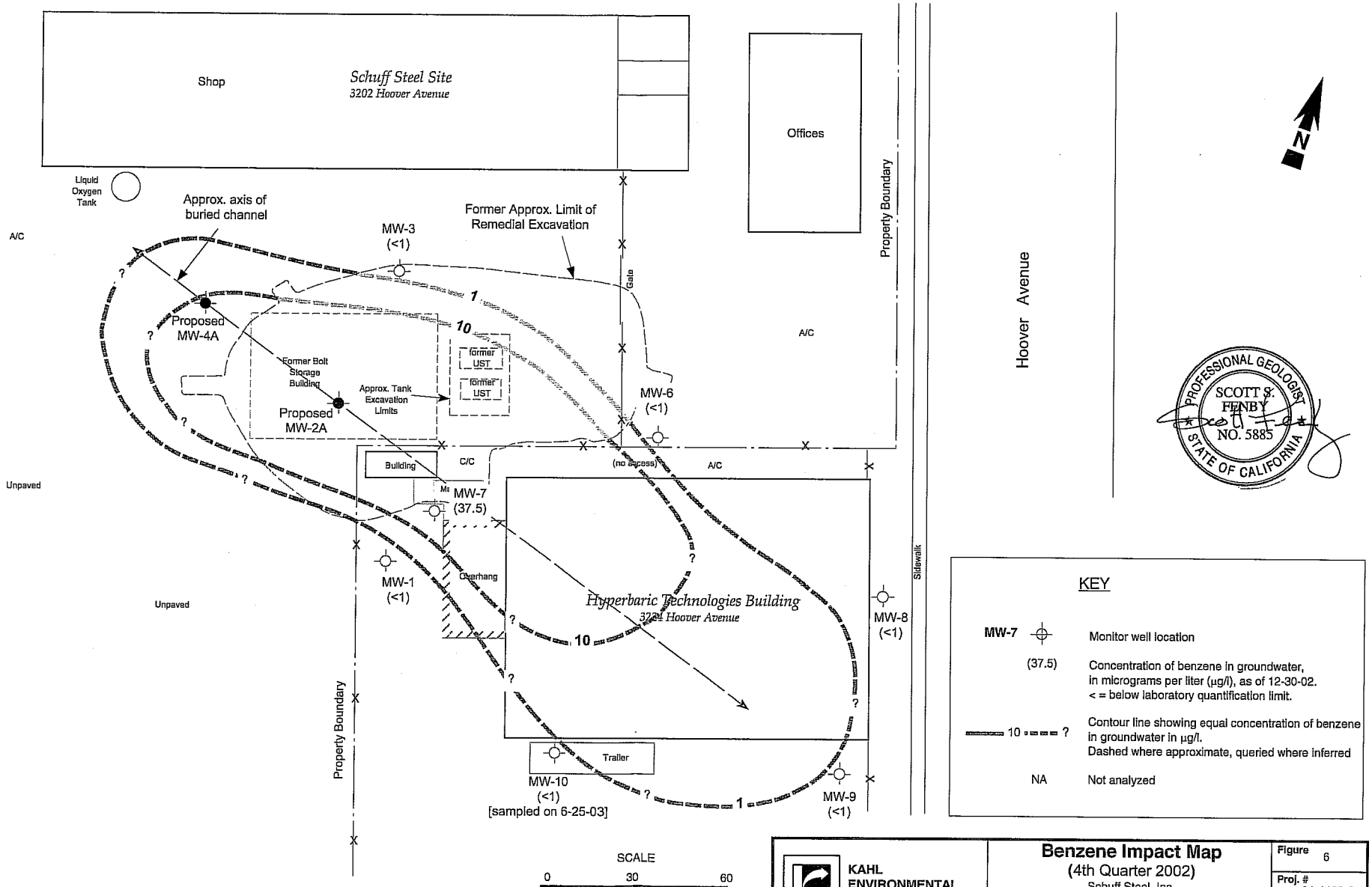
Groundwater Gradient Map

(4th Quarter 2002)

3202 & 3224 Hoover Avenue

National City, California

Figure	5
Proj. #	01-1480-2
Drwg date	7-27-05



KAHL ENVIRONMENTAL SERVICES

Benzene Impact Map

(4th Quarter 2002)

Schuff Steel, Inc.
3202 & 3224 Hoover Avenue
National City, California

Figure	6
Proj. #	01-1480-2
Drwg date	7-27-05

Figure 7
Benzene Concentration vs Time (Well MW-3)
Schuff Steel, Inc.

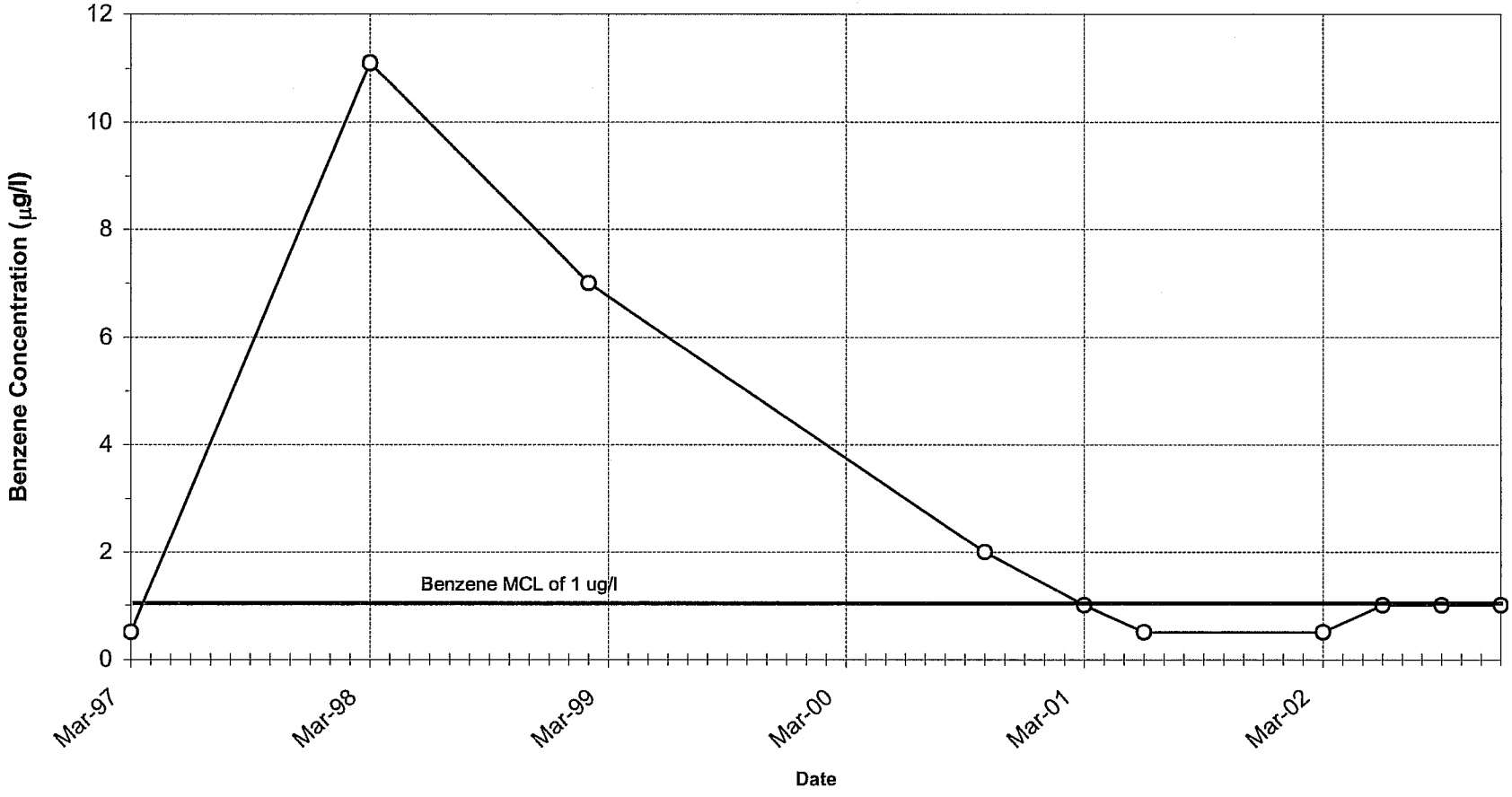


Figure 8
Benzene Concentration vs Time (Well MW-6)
Schuff Steel, Inc.

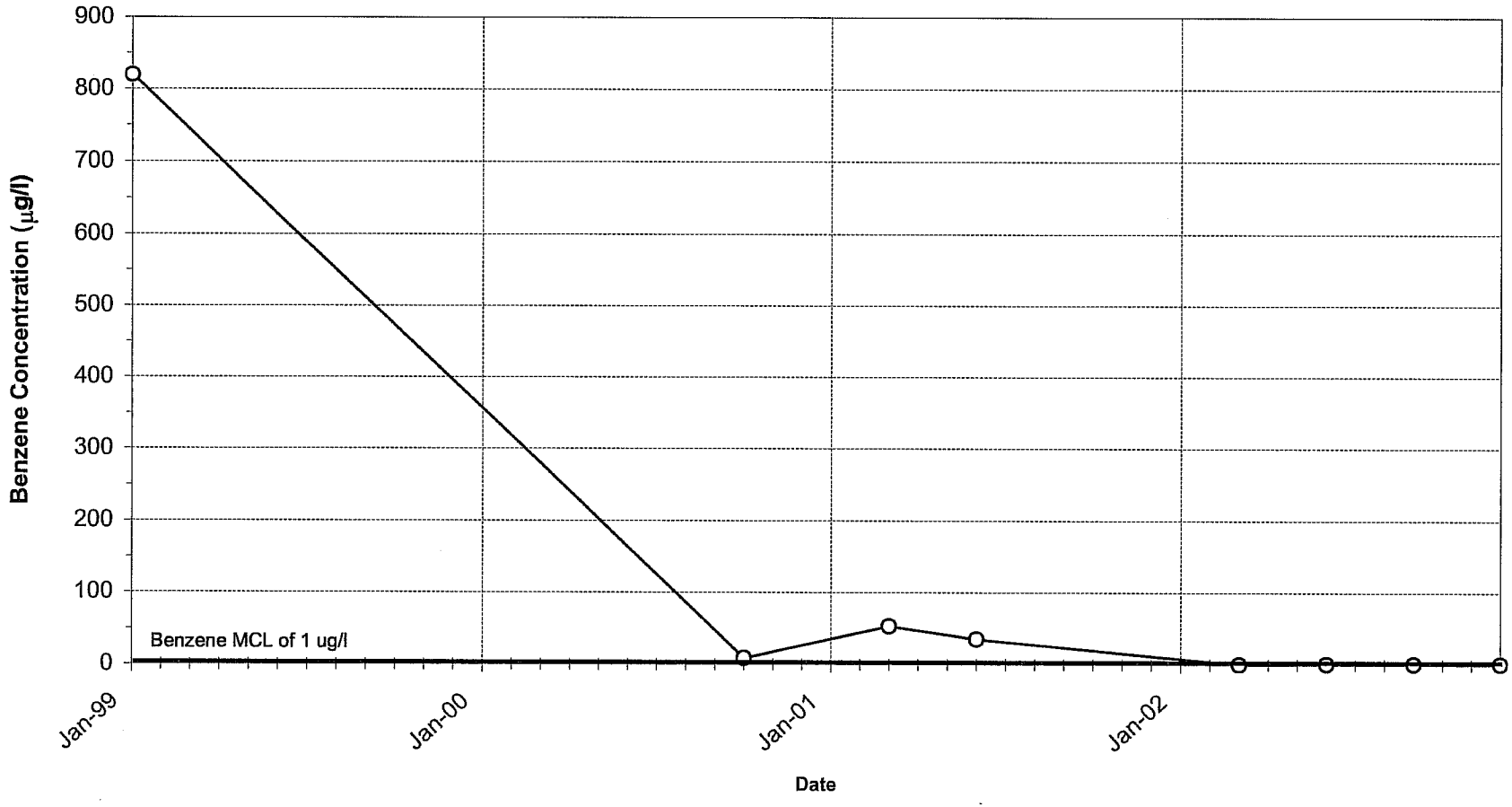


Figure 9
Benzene Concentration vs Time (Well MW-7)
Schuff Steel, Inc.

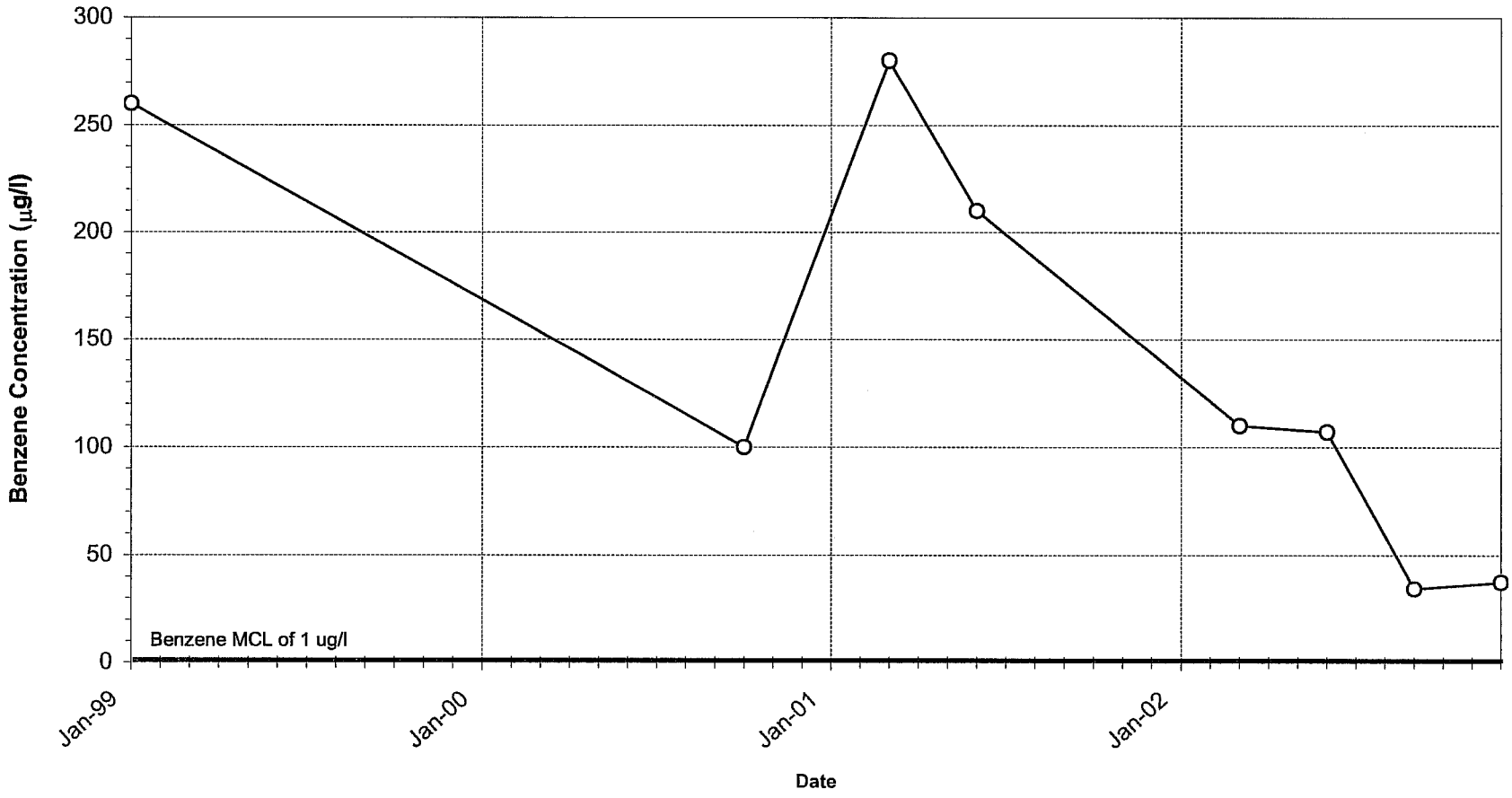


Figure 10
Benzene Concentration vs Time (Well MW-8)
Schuff Steel, Inc.

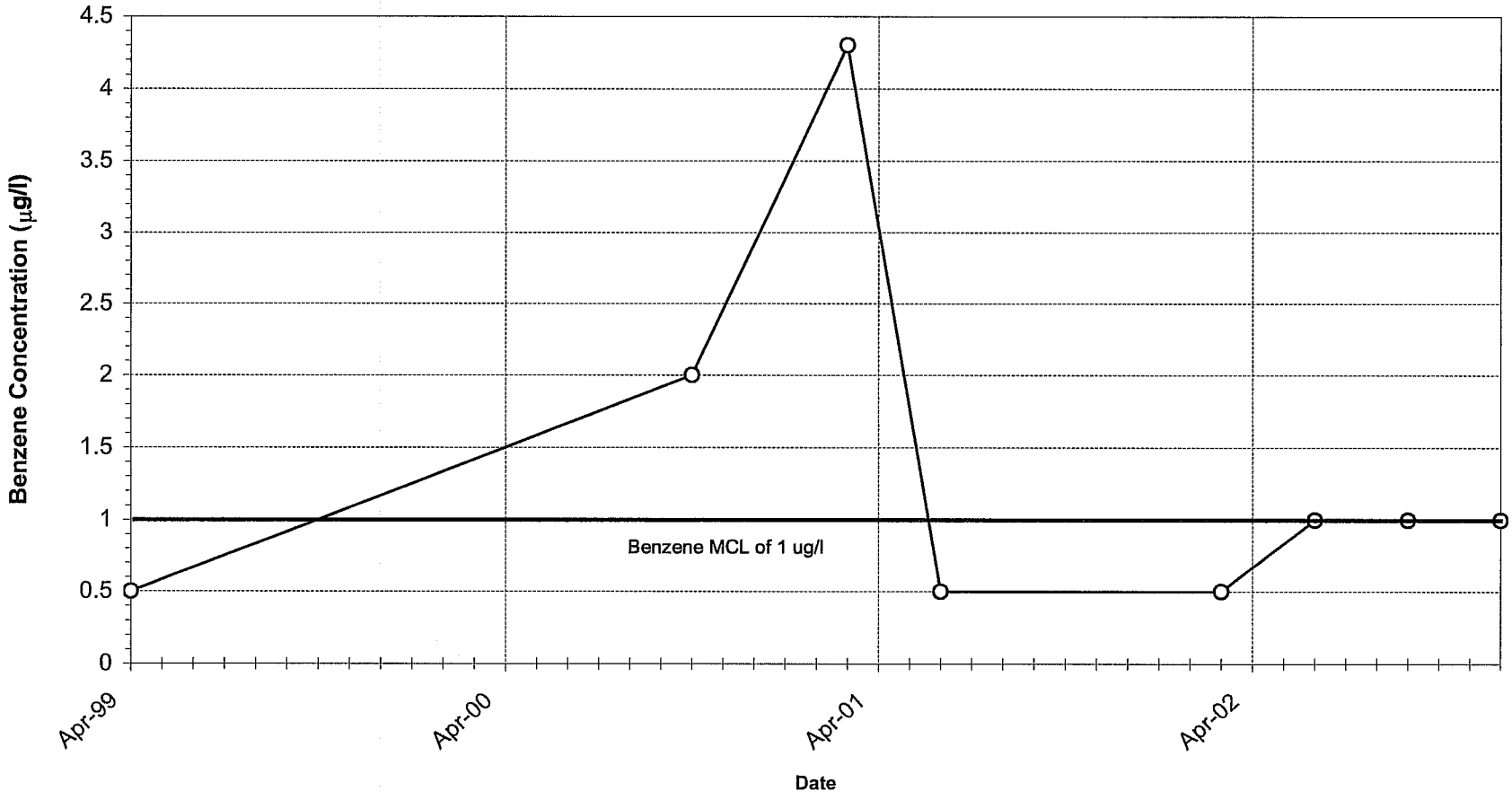


Figure 11
Benzene Concentration vs Time (Well MW-9)
Schuff Steel, Inc.

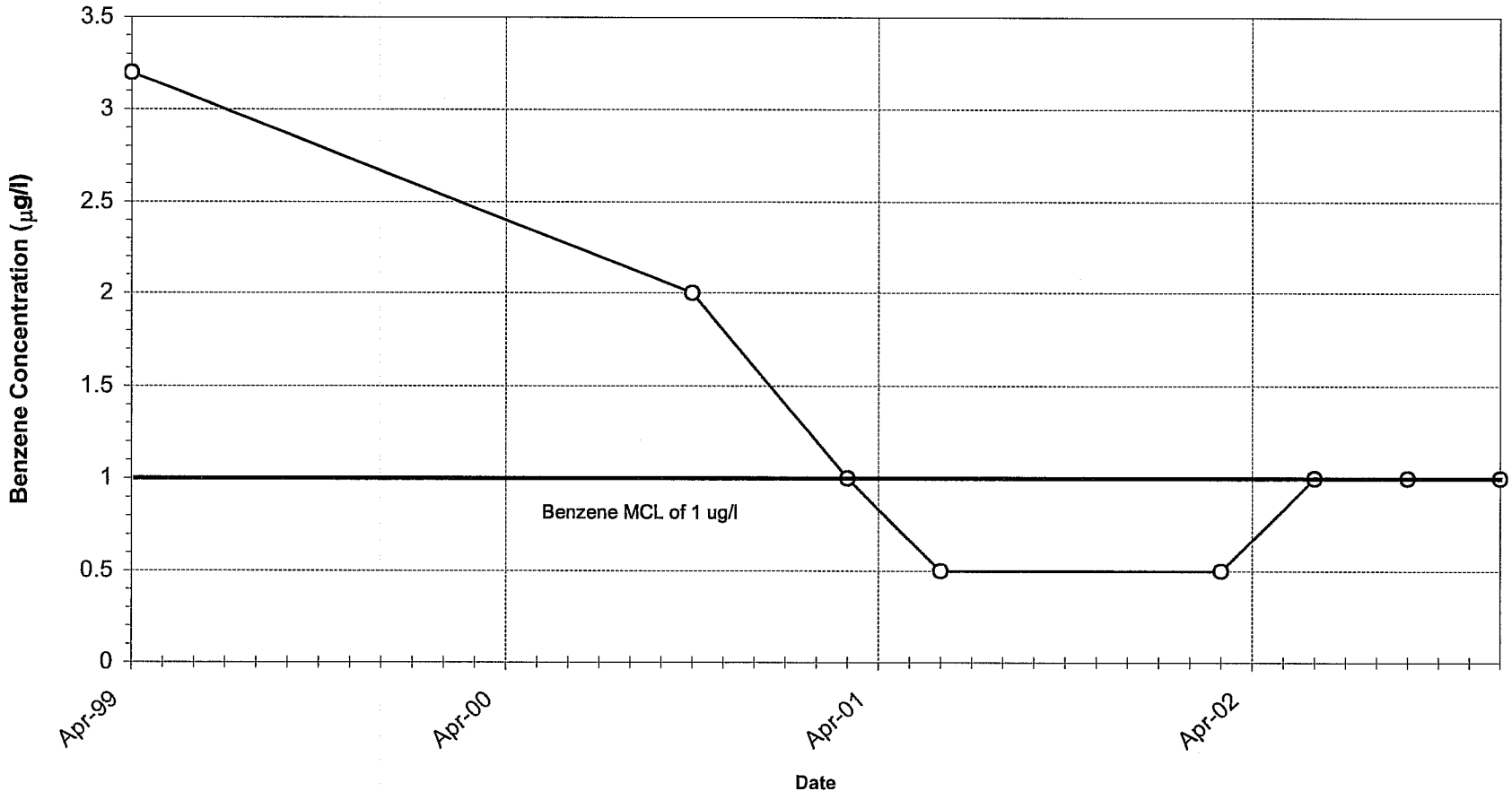


Figure 12
Benzene Concentration vs Time (Well MW-10)
Schuff Steel, Inc.